

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

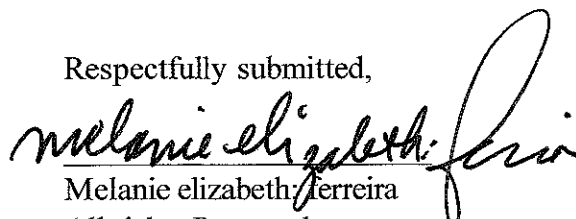
<b>UNITED STATES OF AMERICA</b> <b>Respondent/Plaintiff</b> <b>V</b> <b>Melanie Ferreira</b> <b>Petitioner/Defendant</b> <b>In Propria Personna</b>	<b>X</b> : : : : : : <b>X</b>	<b>7:13-cr-00513-CS-1</b>  <b>NOTICE TO THE COURT</b>  <b>Presented by Affidavit</b>  <b>Verified</b>
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**NOTICE OF CONFLICT OF INTEREST OF GOVERNMENT INFORMANTS**

Comes now defendant/petitioner, a living, breathing woman without effective assistance of counsel, and hereby files this notice of conflict of interest of government informants to the court.

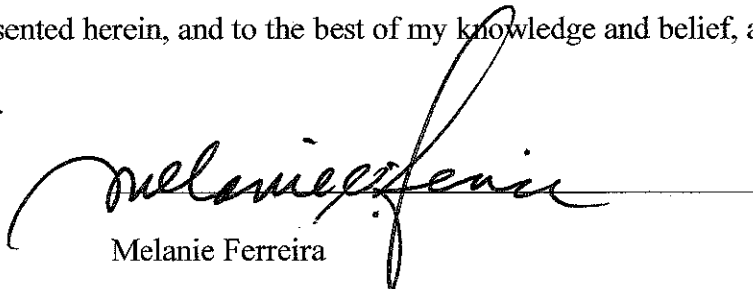
The defendant is hereby noticing this court of conflict of interest of government witness's that are scheduled to testify against the defendant for the UNITED STATES OF AMERICA in case # 7:13-cr-00513-CS-1. The informants are Carlos A. Ferreira and Justin Coons. Attached is a copy of a criminal complaint filed with the Office of Chief Counsel of the IRS, in Washington D.C. and the Attorney General of the United States of America in Washington, D.C. See Exhibit A.

Respectfully submitted,

  
 \_\_\_\_\_  
 Melanie elizabeth Ferreira  
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**JURAT**

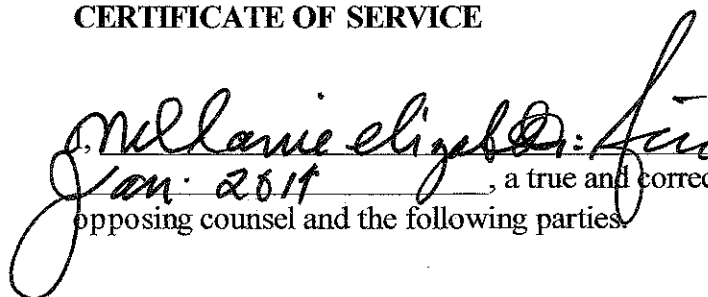
Under penalty of perjury, pursuant to 28 USC section 1746, I declare that I have reviewed the motion presented herein, and to the best of my knowledge and belief, all facts are true and correct.

A handwritten signature in cursive script, reading "Melanie Ferreira", written over a horizontal line.

Melanie Ferreira

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**CERTIFICATE OF SERVICE**

A handwritten signature in cursive script, reading "Melanie Ferreira", written over a horizontal line.

I, Melanie Ferreira, certify that on this 16<sup>th</sup> day of Jan. 2014, a true and correct copy of the foregoing was served on opposing counsel and the following parties.

Honorable Kathy Seibel  
300 Quarropas Street  
White Plains, NY 10601

U.S. Attorney for the Southern District of NY  
Jason P.W. Halperin  
300 Quarropas Street  
White Plains, NY 10601

# EXHIBIT A

**AFFIDAVIT OF CRIMINAL COMPLAINT BY**  
**GOVERNMENT INFORMANT**

UNITED STATES OF AMERICA

V.

CARLOS A FERREIRA

JUSTIN COONS

And Others known and unknown

COMPLAINANT:

Melanie Ferreira  
Address: 130 Bloomer Road  
Lagrangeville, NY 12540  
Phone: 914-621-8788  
Email: mferreira8@optonline.net

January 9, 2014

LOCATION OF CRIME: State of New York, County of DUTCHESS

DATE OF CRIME: January 1998 to present, ongoing criminal enterprise

CRIMES:

#1 Willful Failure to File, 26 USC Section 7203

#2 Mail Fraud, 18 USC sections 1341 and 2

#3 Corruptly Endeavoring to Impair and Impede the Due  
Administration of the Internal Revenue Code, 26 USC section  
7212

#4 False Fictitious and Fraudulent Claims, 18 USC sections 287  
and 2

#5 Conspiracy, 18U.S.C. § 371;

#6 Obstruction of Justice, 18 U.S.C. § 1503, et. Seq.

#7 Perjury 18 U.S.C. § 1621

#7 Accessory After the Fact, 18 U.S.C. § 3

#8 Misprision of felony, 18 U.S.C. § 4

#9 Money laundering, 18 USC § 1956

Notice that complainant is invoking the Protection as a Government Informant:

An informant is a person who provides privileged information about a person or organization to an agency. The term is usually used within the law enforcement world, where they are officially known as confidential or criminal informants (CI), and can often refer pejoratively to the supply of information without the consent of the other parties with the intent of malicious, personal or financial gain.<sup>[1]</sup>

STATE OF NEW YORK §

COUNTY OF DUTCHESS §

I, Melanie Ferreira, the undersigned, certify under the penalty of perjury in accordance with 28 U.S.C. § 1746 that the following violations of federal law did occur by the above named individuals. The criminal acts are ongoing from the date of their inception, beginning on or about January 1999 as well as by their continual cover-up and concealment and fraudulent attempts to hide the acts of their criminal activity. To Date, none of the parties involved has renounced their involvement in the conspiracy, rendering the conspiracy ongoing and the statute of limitations on the crimes frozen.

Other parties may have aided and abetted this criminal enterprise. Parties who aided and abetted the fraudulent activities acted as principals as a matter of law.<sup>1</sup> I have evidence to support each and every claim asserted herein and, in accordance with F.R.Crim.P.4 (a)<sup>2</sup>, request the immediate arrest of the named parties. The criminal acts cost my family the loss of precious assets, and I request that the forfeiture provisions of 18 USC §1963 be invoked for the immediate seizure of the assets of the above named individuals.

From on or about January 2009 until present, in a continuing conspiracy to violate the laws of the United States, the referenced individuals and others, known or unknown, did engage in crimes against United States citizens, to engage in a plan to evade income taxes, as listed above. Carlos A. Ferreira was my ex-husband. I had no knowledge of income tax and relied on my husband to properly prepare the returns and to find an honest accountant to prepare the returns. I learned later that my ex husband had intentionally made a deal with an employer, who may be added as a co-defendant, to be

<sup>1</sup> See 18 U.S.C. § 2. (a) Whoever commits an offense against the United States or aids, abets, counsels, commands, induces or procures its commission, is punishable as a principal. (b) Whoever willfully causes an act to be done which if directly performed by him or another would be an offense against the United States, is punishable as a principal.

<sup>2</sup> "Issuance. If the complaint or one or more affidavits filed with the complaint establish probable cause to believe that an offense has been committed and that the defendant committed it, the **judge must issue an arrest warrant to an officer authorized to execute it.**" F.R.Crim.P. 4(a).

paid under the table so he would not have to report income on his federal tax return. This fraud against the government continued from approximately 1998 until about 2005 I was an innocent spouse, with no understanding of federal tax laws.

### FACTS

1. Carlos Ferreira is the ex-husband of Melanie Ferreira, the complainant.
2. From approximately 1998 to 2005 Carlos Ferreira was the private chef for Joan Weberman and Roy Lennox.
3. From approximately 1998 to 2005 Joan Weberman and Roy Lennox employed Carlos Ferreira.
4. From approximately 1998 to 2005 Justin Coons was the accountant for Carlos Ferreira.
5. Carlos Ferreira hid income that was supposed to be reported to the IRS on his income tax returns from approximately 1998 to 2005.
6. Carlos Ferreira requested to Joan Weberman and Roy Lennox that half of his income be paid under the table.
7. This is cash with no accounting.
8. The complainant, Melanie Ferreira, was not a part of this scheme to defraud.
9. The complainant, Melanie Ferreira, was forced to sign the tax returns from approximately 1998 to 2005 as she was married to Carlos Ferreira.
10. The complainant, Melanie Ferreira has no knowledge of the tax laws.
10. The complainant, Melanie Ferreira has never filed her own tax returns in her life.

### SUMMARY

The parties listed herein for arrest have engaged in illegal acts in order to obtain money in a scheme to defraud the government. Complainant requests their immediate arrests, as is required by F.R.Crim.P. 4(a), and requests they be ordered to pay the damages alleged herein, multiplied by 3 to include punitive damages.

Complainant also requests 25 % of the amount collected from the individuals under the program provided by the IRS for reporting tax fraud.

**Jurat**

Under penalty of perjury, pursuant to 28 USC section 1746, I declare that I have reviewed the motion presented herein, and that all facts are true and correct.

Dated:

*January 9, 2014*

*melanie elizabeth: ferreira*  
melanie elizabeth: Ferreira  
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Cc:

Office of Chief Counsel IRS Attention:  
Attorney Recruitment CC:FM:HR:ARRP  
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U.S. Department of Justice  
950 Pennsylvania Avenue, NW  
Washington, DC 20530-0001

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